



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

March 3, 2016

Mr. Michael D. Harris
Environmental Compliance Manager
New Castle County Department of Special Services
187-A Old Churchmans Road
New Castle, Delaware 19720

Re: Pretreatment Program
NPDES No. DE0050547

Dear Mr. Harris:

On March 26, 2015, EPA conducted a Field Audit inspection of the County's pretreatment program. A copy of the inspection report is enclosed for your use. The inspection report does not raise any significant issues, and therefore no response to the report is necessary.

If you have any questions regarding this matter, please contact me at 215-814-5790.

Sincerely,

A handwritten signature in black ink, appearing to read "John Lovell", is positioned above the printed name.

John Lovell
Pretreatment Coordinator
NPDES Permits and Enforcement (3WP41)
Water Protection Division

Enclosure

cc: Bryan Ashby, DE DNREC (w/enclosure)





**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

February 22, 2016

SUBJECT: Pre-Treatment Inspection Report for New Castle County MOT POTW

FROM: Garth N. Connor, OECEJ- 3EC10
Multi-Media Inspector – Philadelphia Office

TO: John Lovell
Pre-Treatment Coordinator (3WP41)

THRU: Jose Jimenez, OECEJ – 3EC10 *jjj*
Chief, Enforcement & Compliance Assistance Branch

Attached you will find a copy of the Inspection Report for the New Castle County – Middletown Odessa Townsend (MOT) Wastewater Treatment Plant in New Castle County, Delaware. The inspection was conducted on March 26, 2015. If you have any questions or comments on the report, please contact me at 215-814-3209.



POTW PRETREATMENT PROGRAM FIELD AUDIT CHECKLIST

Audit Date	POTW Name
3/26/2015	New Castle County MOT WWTP

Contact Name	Title	Telephone
David Bowie & Mike Harris	Environ. Compliance Managers for New Castle County	302-395-5728
Address	County Road 424, New Castle, DE 19720 - Admin. Offices	
		Yes No
Should this be the person on the mailing list?		X
If no, complete the following for the person to be on the mailing list:		
Name	Title	Telephone
Address		

Participants				
	Name	Title	Organization	Telephone
1	Garth Connor	Inspector	OECEJ	
2	Mke Harris	Environ. Compl. Mgr.	New Castle County	
3	David Bowie	Environ. Compl. Mgr.	New Castle County	
4	Andre Brown-Camp	Intern	New Castle County	
5				

A. Background - Complete prior to on site activity				
1	As required by the approved program, list frequency for:		CIU	SNIU
	POTW sampling of IUs - (No IUs at time of inspection that currently discharge to New Castle MOT. WWTP)		N/A	2-4/year
	POTW inspection of IUs		N/A	1/year
	IU self-monitoring			
	IU reporting			
2	In the last year, indicate frequency of:		CIU	SNIU
	POTW sampling of IUs		N/A	2-4/year
	POTW inspection of IUs		N/A	1/year
	If less than required by the approved program or less than 1/yr (403.8(f)(2)(v)), explain			
3	List all SIUs that were found to have been not sampled or not inspected at the last PCI or annual report N/A			
Name of IU			NS/NI/B	Reason
				New business
4	Does the annual report indicate any new CIUs?		Yes	No
				X
B. POTW Sampling and Inspection				
1	List the SIUs that were either not sampled or not inspected in the last 12 months (403.8(f)(2)(v)):			
Name of IU			NS/NI/B	Date planned/completed
2	Are pH, oil & grease, cyanide, volatile organics, total phenol, and sulfide collected by grab sample?		Yes	No
			X	
	If so, how many grab samples are used?		Variable	
3	Are composite samples used for all other pollutants to evaluate compliance with:		Yes	No
	Categorical standards?			NA
	Local limits?		X	
	Is any unannounced sampling conducted?		X	
4	Is POTW prepared to take samples on short notice (i.e., vehicles, personnel, preservatives, etc. available)?		X	
5	How much time normally elapses between sample collection and obtaining analytical results?			About 2-7 days

6	Does POTW use QA/QC procedures such as:	Yes	No	NA
	Use of calibration and maintenance plan for sampling equipment?	X		
	Training for sampler?	X		
	Split samples (field)?	X		
	Training for analyst?	X		
	Duplicate samples (laboratory)?	X		
	Method blanks (laboratory)?	X		
	Spiked samples (laboratory)?	X		

C. IU Self-Monitoring and Reporting

1	As currently conducted, list frequency for:	CIU	SNIU	
	IU self-monitoring (Variable)	N/A	varies	
	IU reporting	N/A	2/year	
	If less than required by the approved program, explain			
2	If IUs sample more frequently than required, do they report all sampling results to the POTW (403.12(g)(5))?	Yes	No	NA
		X		
3	List all new source IUs N/A			
	Have the following been received by all IUs which became new sources in the last 12 months (403.12)?	# received	# required	
	Baseline Monitoring Reports	N/A		
	Compliance Schedule Milestone Reports	N/A		
	90-day Final Compliance Reports	N/A		
	How does POTW verify the information in these reports?			
4	Do any IUs discharge hazardous waste?	Yes	No	
			X	
	If no, how does POTW verify this?	Thru inspections		
	If yes, has the IU submitted the proper notifications (403.12(p))?	Yes	No	NA
				X

INDUSTRIAL USER FILE EVALUATION

IU Name	Delaware Recyclable Products		
Category	N/A	PWF	
Reg. Params.			
Address			
Comments	IU actually discharges to Wilmington POTW.		
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			
IU Name			
Category		PWF	
Reg. Params.			
Address			
Comments			

NOTE: Complete all questions with a "Y" (yes), "N" (no), "N/A" (not applicable), "U" (unable to determine), or the appropriate number.

FILE REVIEW CHECKLIST		IU1	IU2	IU3	IU4
A. Industrial User Characterization		DRPI			
1. Is the IU categorical (CIU), significant non-categorical (SNIU) or other (O)?	SNIU				
2. Is the IU properly categorized?	Y				
B. Control Mechanism					
1. Does the file contain:					
● an updated control mechanism application and/or survey questionnaire?	Y				
● a current control mechanism?	Y				
● documentation of how control mechanism limits and requirements were established?	Y				
2. Were local limits and/or categorical standards properly applied?	Y				
3. If applicable, were production-based standards correctly applied?	N/A				
4. If applicable, was the combined wastestream formula correctly applied?	N/A				
5. If applicable, were TTO requirements or alternatives correctly applied?	N/A				
6. In the inspector's opinion, is the sample frequency sufficient to determine compliance?	Y				
7. Does the control mechanism include:					
● sampling location and frequency?	Y				
● sample type?	Y				
8. Is the permit effective for 5 years or less?	Y				
C. POTW Inspections of IUs					
1. How many POTW inspections were conducted and documented in the last 12 months?	1				
2. Does the inspection report include:					
● inspector name?	Y				
● inspection date/time?	Y				
● name of IU official contacted?	Y				
● review of manufacturing facilities?	Y				
● verification of production data if needed?	Y				

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
● identification of wastewater sources, flow and types of discharge?	Y			
● condition of pretreatment facilities?	Y			
● evaluation of chemical storage areas?	Y			
● evaluation of need for spill/slug control plan at least every 2 years?	Y			
● evaluation of spill/slug control procedures?	Y			
● evaluation of housekeeping practices?	Y			
● evaluation of potential for hazardous waste discharge?	Y			
● evaluation of self-monitoring equipment and techniques?	Y			
● evaluation of lab procedures?	Y			
● evaluation of monitoring records?	Y			
D. POTW Sampling of IUs				
1. How many sampling visits were conducted and documented in the last 12 months?	2			
2. Does the sampling documentation include:				
● name of sampling personnel?	Y			
● sample date/time?	Y			
● sample type?	Y			
● sample location?	Y			
● wastewater flow during sampling?	Y			
● sample preservation?	Y			
● chain of custody?	Y			
● analytical methods used?	Y			
● analysis date?	Y			
● name of analyst?	Y			
● all analytical data?	Y			
3. Were all regulated parameters monitored?	Y			
4. Were 40 CFR 136 analytical methods used?	Y			
E. IU Self-Monitoring and Reporting				
1. Has the IU submitted all required self-monitoring reports in the last 12 months?	Y			
2. Were all regulated parameters monitored at the required frequency?	Y			

FILE REVIEW CHECKLIST	IU1	IU2	IU3	IU4
F. Slug/Spill Control				
1. Have any slugs/spills been documented in the file?	N			
2. Did the POTW require development of a slug/spill control plan?	N			
3. Has the IU developed a slug/spill control plan?	N			
4. Does the slug/spill plan contain:				
● description of stored chemicals?	N/A			
● procedures to prevent slugs/spills?	N/A			
● procedures to notify POTW of slugs/spills?	N/A			
● follow-up practices to minimize damage from slugs/spills?	N/A			

Inspection Summary - New Castle County's Wastewater Treatment Plant

The EPA inspector visited the administrative offices of New Castle County in New Castle, Delaware to meet with the David Bowie, the facility's Pre-Treatment Coordinator. Mike Harris, the facility's Environmental Compliance Manager, and Andre Brown-Camp, an intern, were also present for the meeting to discuss their pre-treatment operations and oversight program. The wastewater plant itself is called New Castle County Middletown Odessa Townsend (MOT) Wastewater Treatment Plant and is located in Odessa, Delaware in the southern part of New Castle County. Pre-treatment staff located in New Castle's Administrative Offices work closely with the City of Wilmington's wastewater plant since they both have operating wastewater treatment plants and pre-treatment programs operating in the same county.

Facility staff also explained to the EPA inspector that many of the large Industrial Users (IUs) located in New Castle County actually discharge to the City of Wilmington's wastewater treatment plant since it's much closer via the sewer lines. The City of Wilmington's wastewater plant is located in the northern portion of the county where most of the Industrial Users are operating. Both of these wastewater treatment plants are located in New Castle County, but the Wilmington facility is larger and receives and treats the vast majority of their industrial wastewaters. However, the New Castle staff do still write the IU permits for many of the facilities located outside the Wilmington city limits. See **Attachment #1** for a typical IU permit for the Delaware Recyclable Products Inc. (DRPI) Landfill written by New Castle County staff. New Castle Wastewater staff also inspect and sample a number of industrial users in New Castle County on a regular basis, but not those industrial facilities that are located within the Wilmington city limits. **Attachment #2** is a typical chain of custody and a sampling results form from a typical New Castle MOT sampling event. New Castle staff also explained that there may be new industrial users operating in the future, like Hercules Corporation once did, that would discharge wastewater to the New Castle MOT facility. The EPA inspector did not travel to Odessa in order to see the wastewater treatment plant itself.

Attachment #1 - DRPI Discharge Permit



DEPARTMENT OF SPECIAL SERVICES

Certified Mail

November 5, 2011

Mr. Dan Bergan
District Manager
D.R.P.I. Landfill
246 Marsh Lane
New Castle, DE 19720

RE: Wastewater Discharge Permit WDP 89-076, Revision 7
D.R.P.I. Landfill, New Castle, Delaware Facility.

Dear Mr. Bergan:

In accordance with the provisions of the New Castle County Code, Chapter 38.02.700, entitled "Regulation of Non-domestic Wastewater Discharges into the Public Sewer System", the attached amended final permit is hereby issued to D.R.P.I. Landfill, New Castle, Delaware Facility.

The permit will still expire November 4, 2016 and supersedes all previous permits issued to this facility. Pursuant to Section 38-269 of the New Castle County Code, the permit may be revised as limitations or requirements are modified or changed. Monitoring reports shall be submitted by July 31 and January 31 for the previous six-month monitoring period.

Should you have any questions or require further information on the above, please contact David Bowie at 395-5728.

Sincerely,

Michael D. Harris
Environmental Compliance Manager

Encl.
cc: J. Husband, NCC
Mary Neutz, City of Wilmington, Encl.
David Bowie, NCC, File, Encl

file:c:\permit\89-076\permltr2011.doc

NEW CASTLE COUNTY
DEPARTMENT OF PUBLIC WORKS
100 New Churchmans Road
New Castle, Delaware 19720

WASTEWATER DISCHARGE PERMIT

In accordance with the provisions of the General Pretreatment Regulations at 40 CFR Parts 125 and 403, and pursuant to New Castle County Code, Section 38.02.700, entitled "Regulation of Non-domestic Wastewater Discharges into the Public Sewer System," as amended September 18, 1996 and any applicable Federal or State law or regulation:

Delaware Recyclable Products, Inc.
201 Marsh Lane
New Castle, Delaware 19720

is authorized to discharge wastewater to the New Castle County Sewer System from the facility located at:

Minquadale Landfill
New Castle, Delaware

subject to the permit conditions established herein.

Effective Date: November 5, 2011

Expiration Date: November 4, 2016

Date: November 5, 2011

Signed: Michael P. Harn
Environmental Compliance Manager

PERMIT CONDITIONS

A. General.

1. The named permit holder shall be expressly subject to all provisions of Section 38.02.700, of the New Castle County Code and all other regulations, user charges, and fees established by the County.
2. This Wastewater Discharge Permit is issued in the name of the permit holder and shall not be reassigned, transferred or sold to a new owner, new user, different premises, or a new or changed operation.
3. The permit holder shall report to the New Castle County Department of Special Services (the "Department") any changes (permanent or temporary) to the premises or operations that significantly change the quality or quantity of the wastewater discharge described in the Wastewater Discharge Permit Application submitted by the permit holder, or deviate from the terms or conditions under which this permit is granted.
4. The permit holder may be held liable for any actual damages and/or extraordinary expenses incurred by the Publicly Owned Treatment Works (POTW) caused in full or in part by the permit holder as determined from the investigation and the findings by the General Manager of Special Services. The General Manager may seek to recover reasonable attorney's fees, court costs, monitoring costs, and other expenses associated with cost recovery and other enforcement activities.
5. This permit is subject to revision to reflect any changes to the County code or any applicable categorical standards as and when they are promulgated by the U.S. E.P.A.
6. The permit holder is subject to all enforcement actions, to include penalties established in Section 38.02.700, of the New Castle County Code, for violating permit conditions.
7. All reports and correspondence shall be submitted to the following address:

Environmental Compliance Manager
Department of Special Services
187-A Old Churchman's Road
New Castle, Delaware 19720

B. Effluent Limitations.

1. Permissible Mass Limits. The discharge from the designated location shall be limited to the effluent quality limitations as defined in New Castle County Code, Section 38.02.700 except for the following:

Maximum Permissible Loading (lbs/day)

<u>Effluent Constituent</u>	<u>30 Day Average</u>	<u>Maximum Daily</u>
**As	0.240192	0.360288
Cd	0.0701	0.105
***Cr	0.10	0.15
***Cu	0.15	0.225
Cn	<u>N/A</u>	0.736
Pb	0.049	0.074
Hg	0.0057	0.00856
Mo	<u>N/A</u>	<u>N/A</u>
Ni	1.001	1.501
Se	0.6505	0.976
Zn	3.49	5.239
*Ammonia (NH3-N)	100	150
TSS	500.4	750
BOD ₅	500.4	750

***Ammonia variance limit based on 100 mg/l at 0.120 MGD**

****Arsenic variance limit based on 0.24 mg/l at 0.120 MGD**

***** Chromium and Copper allocations have been increased by request of the permittee**

Maximum Permissible Concentration

<u>Effluent Constituent</u>	<u>30 Day Average</u>	<u>Maximum Daily</u>
***Hydrogen sulfide	1.00 mg/L	10.00 mg/L
Total toxic organics (TTO)	N/A	10.00 mg/L

***** Pretreatment for sulfides is required and is in place**

2. Categorical Limitations. Discharge is subject to the categorical pretreatment standards for: N/A. These standards shall be in addition to the general prohibitions of the New Castle County Code, and in cases where the same constituent is addressed, the more stringent limitation will apply.

3. Rate of Discharge.

a. The daily average discharge shall mean the total discharge in gallons during a six-month monitoring period divided by the number of days in the period in which production was occurring or the commercial facility was operating. The daily average discharge permitted at the facility shall not exceed:

120,000 GPD

b. The maximum instantaneous discharged flow rate shall not exceed:

N/A

c. A meter to measure the wastewater discharge shall be installed at the following location:

N/A

By (date): N/A

Metering devices pertinent to the discharge(s) shall be maintained in good working order and calibrated as needed.

C. Monitoring, Sampling, Inspections, Reporting, and Records Retention.

1. Monitoring. The permitted discharge shall be monitored by the permit holder in compliance with the following schedule:

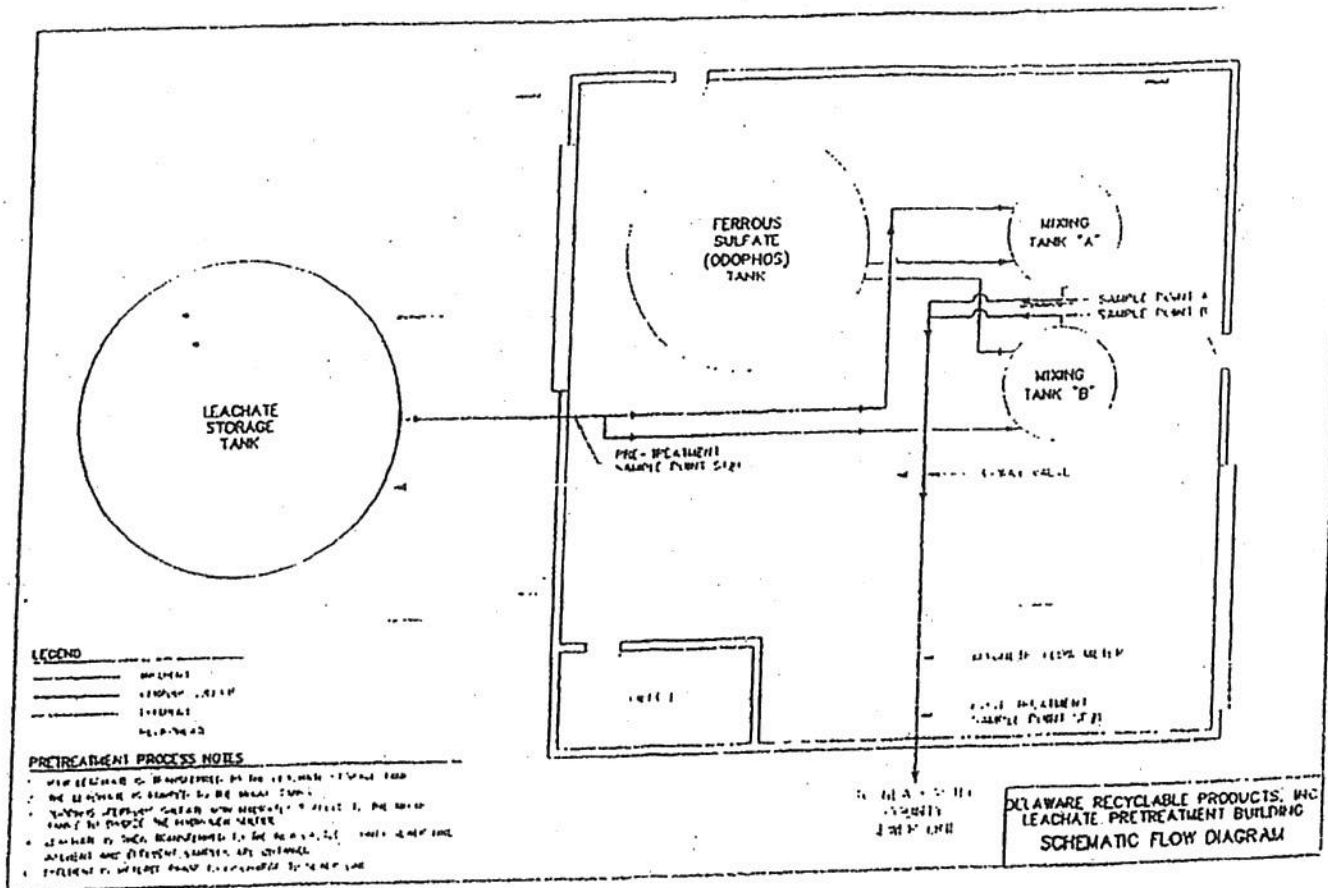
<u>Effluent Constituent</u>	<u>Frequency</u>	<u>Measurement</u>	<u>Sample Type</u>
Hydrogen sulfide	1/ Week		Grab
<u>Hydrogen sulfide*</u>	1/ Week		Grab
pH	1/ Week		Grab
As, Cd, Cr, Cu, CN, Pb	1/ Month		24-hr Composite
Hg, Mo, Ni, Se, Zn	1/ Month		24-hr Composite
NH3-N	1/ Month		24-hr Composite
BOD ₅	1/6 Months		24-hr Composite
Total Suspended Solids	1/6 Months		24-hr Composite
TTO Non-purgeables	1/6 Months		24-hr Composite
TTO Purgeables	1/6 Months		Composite of 4 Grabs

*Taken prior to treatment

2. Sampling.

a. Samples taken in compliance with the monitoring requirements specified above shall be collected at the following locations:

Pre-pretreatment and post-pretreatment sample points as identified on the Leachate Pretreatment Building schematic.



b. In accordance with Section 38.02.700 of the New Castle County Code, the permit holder is required to install a sampling and inspection manhole at the following location:

Sampling location is in place as described above

3. Inspections. Duly authorized employees of New Castle County, bearing proper credentials and identification, shall be permitted to enter all premises in compliance with New Castle County Code, Section 38.02.700 for the purpose of inspection of processes, records, and the like.

4. Periodic Discharge Reports and Progress Reports on Compliance Schedule. A report containing the results of the monitoring program and progress reports on compliance (if any) shall be filed with the New Castle County Department of Special Services by January 31 and July 31 of each year for the previous six-month period. The results of all self-monitoring, including the results of monitoring done more frequently than required, shall be submitted. Reports shall be submitted in the attached format (Attachments 1 of 6 through 6 of 6 of this permit).

The report shall include at a minimum the following:

Nature and concentration of regulated pollutants, average and maximum daily flow rates, methods of sampling and analysis, sample site, date of sample, who collected the sample and the flow rate at time of sampling, certification of meter calibration, and a certification that the methods used conform to those approved by the U.S. E.P.A. Reports shall be signed in compliance with the signatory requirements in 40 CFR 403.12 (I). If analysis results indicate a particular pollutant is not detected, the detection limit shall be reported.

5. Records Retention. All records and information resulting from the monitoring activities required by this permit, including sample time, sampler name, date of sample analysis, analysts name, calibration and maintenance of instrumentation, and continuous monitoring charts shall be retained for three (3) years. This period shall be extended automatically during the course of any unresolved litigation regarding the regulated activity or control standards applicable to the permittee, or as requested by the Department

D. Notice Requirements.

1. Noncompliance Notification. If the permitted discharge does not comply with any effluent limitations specified in this permit or in the New Castle County Code, the permittee shall inform the Department via telephone at 395-5728 or the County Dispatcher at 395-5700 within 24 hours of becoming aware of the violation, and follow up with written notification within 5 working days which shall include an explanation of the violation, the steps taken to correct the violation and the steps taken to prevent future occurrences. The permittee shall also repeat sampling and analysis and submit the results within 30 days of becoming aware of the violation.
2. RCRA Notification. The permitted facility may be subject to hazardous waste requirements under the Resource Conservation and Recovery Act, Subtitles C & D. The State of Delaware Department of Natural Resources and Environmental Control, Division of Air and Waste Management, 89 Kings Highway, PO Box 1401, Dover Delaware 19903 regulates hazardous waste in the state and must be contacted to determine your obligations, if any, under this Act. The permitted facility shall also notify DNREC and the County in the event of discharge of hazardous waste into the sewer system and to the POTW, in accordance with 40 CFR 403.12 (p) (1).
3. Notice of Slug Loading. In accordance with 40 CFR Part 403, Section 403.12(f), the discharger shall immediately notify the Department of any slug loading of any pollutant (including oxygen demanding pollutants) released to the treatment system at a flow rate or concentration likely to cause operational problems in the sewer system or at the POTW. (Call 395-5728 during office hours, 395-5700 at other times.)

E. SPECIAL CONDITIONS.

1. This Permit supersedes any other approval issued previous to the effective date of this permit.
2. All analyses conducted in accordance with Section C1 of this permit shall conform to 40 CFR 136 analytical methods for determination of total metals concentrations, unless stated otherwise.
3. The grab sampling specified in Section C1 shall be performed during hours in which production is occurring or the facility is operating.
4. The composite sampling specified in Section C1 shall be performed during hours in which production is occurring or the facility is operating.
5. An ammonia-nitrogen (NH₃-N) allocation of 100 pounds/day is provided for this permit through a variance.

Industry: Delaware Recyclable Products, Inc.

Permit Number: 89-076
Revision Number: 7
Attachment 1 of 3

Part I - Analysis Results

[illegible]

Periodic Self-Monitoring Report

Reporting Period:

Permit Number: 89-076

Revision Number: 7

Attachment 2 of 3

Industry: Delaware Recyclable Products, Inc.

Part I - Analysis Results

[illegible]

(Use copies of this form if additional space is required)

*sample to be taken after treatment

****Sample to be taken prior to treatment**

Ammonia limits are provided through a permit variance

Periodic Self-Monitoring Report

Reporting Period: January - June / July - December

Permit Number: WDP-89-076

Revision Number: 7

Attachment 3 of 3

Industry: Delaware Recyclable Products, Inc.

Part II - Flow Rates

	Max	Avg		Peak (GPM)	Max (GPD)	Avg (GPD)
Permitted Flow (GPD)	NA	120,000	Reported Flow			

Part III - Methods

A. Sampling Method

All samples are flow / time (rate) over proportion composites except in "Large Discharges" which are in situ composites of four (4) grab samples collected over the period of the discharge. Wetlands from the method are as below (include sample date, parameter, and reason):

B. Methods of Analysis

All analytical methods conform to those approved by the U.S. EPA except:

Part IV - Certification

A. Results indicate that the wastewater discharge standards are being met on a consistent basis:
If 'No', explain on a separate sheet what steps are being taken to achieve consistent compliance.

___ Yes ___ No

B. The discharge flow meter has been calibrated within the past year: ___ Yes ___ No

Date of last calibration: _____

C. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative

Date

Name

Title

Attachment #2 - Sample Results & Chain of Custody

Job Description

Sampling/Site Group	IDM GROUP F	Received Date	7/22/14
Program/Project Name	INDUSTRIAL DISCHARGE MONITORING	Received Time	11:00 AM
Client/Recipient	DAVID BOWIE	Job Number	4425

Summarized Results

Client Name	DELAWARE RECYCLABLE PRODUCTS	Start Date/Time	7/22/14	10:00 AM
Sample Name	Compliance sample	End Date/Time	7/22/14	10:00 AM
Lab Log Number	19484			

Parameter	Result	Limit	Units	Test Meth Ref	Start Date	Start Time	Finish Date	Finish Time	Analyst
AMMONIA	111.35	2.00	MG/L		7/25/14	9:10 AM	7/25/14	1:15 PM	JRH
ARSENIC	23.49	5.00	ug/L	EPA 200.9 REV. 2.8/4/14	8/4/14	1:25 PM	8/4/14	4:35 PM	JRH
BOD, 5 DAY	29.00	1.00	MG/L	SM 5210 B	7/23/14	11:50 AM	7/28/14	11:05 AM	SM
CADMIUM	ND	0.20	ug/L	EPA 200.9 REV. 2.8/1/14	8/1/14	8:15 AM	8/1/14	1:50 PM	JRH
COD	454.00	00.00	MG/L	SM 5220 C	11/17/14	9:30 AM	11/17/14	1:30 PM	VD
Chromium	11.63	1.00	ug/L	EPA 200.9 Rev. 2.28/7/14	8/8/14	8:15 AM	8/8/14	9:40 AM	JRH
Copper	434.40	2.00	ug/L	EPA 200.9 Rev. 2.28/5/14	8/6/14	1:30 PM	8/6/14	3:05 PM	JRH
Lead	ND	5.00	ug/L	EPA 200.9 Rev. 2.27/31/14	7/31/14	8:25 AM	7/31/14	11:00 AM	JRH
MERCURY	ND	1.00	ug/L	EPA 245.2	9/29/14	11:55 AM	9/29/14	1:00 PM	JRH
Nickel	7.13	5.00	ug/L	EPA 200.9 Rev. 2.28/5/14	8/5/14	10:10 AM	8/5/14	1:15 PM	JRH
SULFIDE	0.11	0.05	MG/L	SM 4500-S2-G	7/22/14	10:00 AM	7/29/14	2:00 PM	ACL
Selenium	ND	5.00	ug/L	EPA 200.9 Rev. 2.28/4/14	8/4/14	8:35 AM	8/4/14	1:05 PM	JRH
TSS	47.00	1.00	MG/L	SM 2540 D	7/28/14	2:00 PM	7/29/14	2:00 PM	SM
Zinc	23.49	0.05	MG/L	SM 3111 B	8/4/14	1:25 PM	8/4/14	4:35 PM	JRH

Reviewed By: _____

Review Date: _____

Note: ND = Non Detected

**CHAIN OF CUSTODY
REQUEST FOR ANALYSIS**

Document No. **4425**

Page 1 of 1

[illegible]